

**LAW OFFICES OF DALE K. GALIPO**

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*Attorneys for Plaintiffs*

**UNITED STATES DISTRICT COURT FOR THE  
CENTRAL DISTRICT OF CALIFORNIA**

SANDRA KIRKMAN, CARLOS  
ALANIZ, individually and successors-in-  
interest to JOHN ALANIZ, deceased,  
  
Plaintiffs,

vs.

STATE OF CALIFORNIA, RAMON  
SILVA, and DOES 1-10, inclusive,  
  
Defendants.

Case No. 2:23-cv-07532-DMG-SSC  
[Hon. Dolly M. Gee]

**JOINT TRIAL WITNESS TIME  
ESTIMATE FORM**

Pre-Trial Conference  
March 25, 2025, 2:00 p.m.

Trial  
April 15, 2025, 8:30 a.m.

1       **PLEASE TAKE NOTICE** that the Parties hereby submit the Joint Trial Witness  
2 Time Estimate Form as “Attachment A” to this filing. The parties reserve their rights to  
3 supplement and amend this form.

4       Respectfully submitted,

5 DATED: March 14, 2025

**LAW OFFICES OF DALE K. GALIPO**

8 By: /s/ Cooper Alison-Mayne  
9 Dale K. Galipo, Esq.  
10 Cooper Alison-Mayne<sup>1</sup>  
11 *Attorneys for Plaintiffs*

12  
13 DATED: March 14, 2025

**DEAN GAZZO ROISTACHER**

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16 By: /s/ Lee H. Roistacher  
17 Lee H. Roistacher, Esq.  
18 *Attorneys for Defendants, State of California,*  
19 *acting by and through the California Highway*  
20 *Patrol, and Ramon Silva*

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<sup>1</sup> Pursuant to Local Rule 5-4.3.4, as the filer of this document, I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing’s content and have authorized the filing.

## ATTACHMENT A

### JOINT TRIAL WITNESS TIME ESTIMATE FORM

Case No. and Title: 2:23-cv-07532, *Sandra Kirkman v. State of California*

Trial Date: April 15, 2025

No.	Witness			
1.	<b>SILVA, RAMON</b>			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	3.0
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	2.0 (rebuttal/direct)
	<u>Brief Description of Testimony:</u>	Eyewitness to incident		
2.	<b>VAN DRAGT, JOHNATHAN</b>			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	1.0
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	1.0 (rebuttal/direct)
	<u>Brief Description of Testimony:</u>	Eyewitness to incident		
3.	<b>ACOSTA, ANDREW</b>			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	0.5
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	.8 (cross/direct)
	<u>Brief Description of Testimony:</u>	Eyewitness to incident		

No.	Witness			
4.	EMMANUEL, CLARK			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	0.25
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	.25
	<u>Brief Description of Testimony:</u>	Eyewitness to incident		
5.	HUSS-BAWAB, JULIE			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	1.0
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	1.0 (cross/direct)
	<u>Brief Description of Testimony:</u>	Coroner; testimony about injuries and cause of death		
6.	SCHAEFER, PATRICK			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	0.25
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	.5 (cross/direct)
	<u>Brief Description of Testimony:</u>	Eyewitness; cause of death, pain and suffering		

No.	Witness			
7.	OMALU, BENNET			
	Direct Examiner:	Plaintiffs	Direct Exam Time Est.:	1.5
	Cross Examiner:	Defendants	Cross Exam Time Est.:	1.0
	Brief Description of Testimony:	Forensic Pathologist, cause of death, pain and suffering		
8.	DEFOE, SCOTT A.			
	Direct Examiner:	Plaintiffs	Direct Exam Time Est.:	1.5
	Cross Examiner:	Defendants	Cross Exam Time Est.:	1.0
	Brief Description of Testimony:	Police practices expert		
9.	ALANIZ, CARLOS			
	Direct Examiner:	Plaintiffs	Direct Exam Time Est.:	0.5
	Cross Examiner:	Defendants	Cross Exam Time Est.:	.5
	Brief Description of Testimony:	Decedent and Plaintiffs relationship with Decedent		

No.	Witness			
10.	<b>KIRKMAN, SANDRA</b>			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	0.5
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	.5
	<u>Brief Description of Testimony:</u>	Decedent and Plaintiffs relationship with Decedent		
11.	<b>[Placeholder for additional medical witnesses, including EMTs, doctors, and coroners, to be called if the listed witnesses are unavailable]</b>			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	
	<u>Brief Description of Testimony:</u>	Eyewitness to incident		
12.	<b>[Placeholder for additional medical witnesses, including EMTs, doctors, and coroners, to be called if the listed witnesses are unavailable]</b>			
	<u>Direct Examiner:</u>	Plaintiffs	<u>Direct Exam Time Est.:</u>	
	<u>Cross Examiner:</u>	Defendants	<u>Cross Exam Time Est.:</u>	
	<u>Brief Description of Testimony:</u>	Eyewitness to incident		

No.	Witness			
13.	VERDUGO, CECIL			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	.5
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	.5
	Brief Description of Testimony:	Eyewitness to incident		
14.	CHAPMAN, CLARENCE			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	1.5
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	1.5
	Brief Description of Testimony:	Expert – police practices		
15.	BLAKE, DAVID			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	1.5
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	1.5
	Brief Description of Testimony:	Expert – human factors		

No.	Witness			
16.	ENGLERT, ROD			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	2.0
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	1.5
	<u>Brief Description of Testimony:</u>	Expert – incident reconstruction		
17.	WAGAR, NIKKI			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	1.0
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	1.0
	<u>Brief Description of Testimony:</u>	Expert – incident reconstruction/forensic evidence		
18.	KANZLER, CHERYL			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	1.0
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	1.0
	<u>Brief Description of Testimony:</u>	Expert – incident reconstruction/forensic evidence		



No.	Witness			
19.	GRAHAM, MICHEAL			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	1.0
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	1.0
	Brief Description of Testimony:	Expert – medical examiner		
20.	LYONS, SAMIR			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	.5
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	.5
	Brief Description of Testimony:	Non-retained expert – foundation for scene reconstruction animations		
21.	NORRIS, SCOTT			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	.8
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	.5
	Brief Description of Testimony:	Prior similar incident by decedent		

No.	Witness			
22.	<b>DIGBY, ADAM</b>			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	.25

	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.25
	<u>Brief Description of Testimony:</u>	Paramedic/EMT		
23.	<b>FUENTES, VANESSA</b>			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	.25
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.25
	<u>Brief Description of Testimony:</u>	Paramedic/EMT		
24.	<b>ARIAS, ELAINE</b>			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	.25
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.25
	<u>Brief Description of Testimony:</u>	Prior medical records of decedent		

No.	Witness			
25.	CHONG, YOU SUK			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	.8
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	.5
	Brief Description of Testimony:	Decedent’s medical history		
26.	COKER, NATHAN			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	1.0
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	.5
	Brief Description of Testimony:	Academy Instructor		
27.	* CUSTODIAN OF RECORDS TORRANCE POLICE DEPARTMENT			
	Direct Examiner:	Defendants	Direct Exam Time Est.:	.25
	Cross Examiner:	Plaintiffs	Cross Exam Time Est.:	.1
	Brief Description of Testimony:	Prior similar incident by decedent records		

No.	Witness			
28.	* CONSTODIAN OF RECORDS PROVIDENCE LITTLE MARY HOSPITAL			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	.25
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.1
	<u>Brief Description of Testimony:</u>	Prior medical records of decedent		
29.	* CONSTODIAN OF RECORDS HOAG MEDICAL CENTER			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	.25
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.1
	<u>Brief Description of Testimony:</u>	Prior medical records of decedent		
30.	* CONSTODIAN OF RECORDS HOAG MEMORIAL HOSPITAL			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	.25
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.1
	<u>Brief Description of Testimony:</u>	Prior medical records of decedent		

No.	Witness			
31.	* BUENO, C			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	1.0
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.5
	<u>Brief Description of Testimony:</u>	CHP MAIT Sergeant		
32.	* CHEN, J			
	<u>Direct Examiner:</u>	Defendants	<u>Direct Exam Time Est.:</u>	1.0
	<u>Cross Examiner:</u>	Plaintiffs	<u>Cross Exam Time Est.:</u>	.5
	<u>Brief Description of Testimony:</u>	CHP MAIT Investigator		